

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION**

Maxwell Kremer,

Plaintiff,

v.

Reddit, Inc.,

Defendant.

Civil Action No.: 2:21-cv-00038

**CHIEF JUDGE WAVERLY D.
CRENSHAW, JR.**

**MAGISTRATE JUDGE
ALISTAIR NEWBERN**

JURY DEMAND

**DEFENDANT’S MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION TO DISMISS PLAINTIFF’S CLAIMS FOR FAILURE TO STATE A CLAIM**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendant Reddit, Inc. (“Reddit” or “Defendant”), respectfully submits this Memorandum of Law in support of its Motion to Dismiss *pro se* plaintiff Maxwell Kremer’s (“Kremer” or “Plaintiff”) claims for failure to state a claim upon which relief can be granted, and states as follows.

FACTUAL BACKGROUND

According to the Complaint, Kremer is a resident of Overton, Tennessee and owner of a one-man business (or at least certain intellectual property) he calls Simcrimecom. *See* Complaint ¶ 1, filed Aug. 8, 2021. Reddit operates the reddit.com platform, a network of user-driven online communities where, every day, millions of people from around the world come together to read, share, discuss, and debate on the basis of shared interests. Reddit communities, also called “subreddits,” span a range of topics, from news, to conversations with historians, to lighthearted photos of animals.

The allegations in Plaintiff’s Complaint all relate to a single user-submitted post in the r/southpark subreddit on Reddit that Plaintiff claims violates his copyright and trademark rights.

Attached hereto as Exhibit 1 is a screenshot from the reddit.com website of the post referenced in the Complaint.¹ Plaintiff alleges that, by virtue of that user-submitted post, Reddit “display[ed] copyright and trademark on its business website without permission”; that “[o]ne of the defendant Reddit.com’s agents, or accomplices, photographed the Simcrimecom tm store location, depicting the brand copyright logo and painted signage that reads ‘Do not photograph this property. No consent.’”; and that Reddit “us[ed] the illegal photograph in ad work on it’s [sic] business website.” Compl. ¶ 5. Plaintiff separately alleges that Reddit “advertises it’s [sic] own ability to offer management services, as ads and media advertisings [sic].” Compl. ¶ 8.²

As for the rights allegedly infringed by the user-submitted post, Plaintiff attaches a federal copyright registration and a Tennessee state trademark registration. The copyright registration certificate relates to an “artwork” identified simply as “Maxwell Kremer’s image 1.” Compl., Ex. A. The Complaint does not attach the copyrighted work, identifying it only as a “logo,” Compl. ¶¶ 5, 6, and by reference to where it supposedly appears in the allegedly infringing photograph: “The pirated copyright logo is seen in the webpage image as a rectangular white sign with black icon.” Compl. ¶ 5. The trademark registration relates to the wordmark “simcrime.com” for use in connection with “business management” services, though the numbered allegations refer to the mark as one word with no period (“Simcrimecom”). Compl. ¶¶ 1, 4, 6, 8; Ex. B.

¹ *Mediacom Se. LLC v. BellSouth Telecommunications, Inc.*, 672 F.3d 396, 400 (6th Cir. 2012) (“Documents integral to the complaint may be relied upon even if they are not attached or incorporated by reference...”) (internal citations omitted).

² Plaintiff makes additional factual allegations that do not appear to support any of his intellectual property infringement claims. For example, Plaintiff alleges that the “San Francisco Police Department approved a police report...for felony copyright infringement” and that “Reddit has no contract with Plaintiff.” Compl. ¶¶ 9, 10. Because these allegations are unrelated to the claims, Defendant does not discuss them in this Motion.

Based on these allegations, the Complaint's claims are best characterized as copyright infringement and trademark infringement, all related to the single user-submitted post on the Reddit platform. Compl. ¶¶ 4-11. On these claims, the Complaint seeks "a judgement...for punitive damages, or for monetary compensation relief" totaling \$100,000,000 and injunctive relief. Compl. ¶¶ 11-13.

LEGAL STANDARDS

A complaint must contain "a short and plain statement" of each "claim showing that the [plaintiff] is entitled to relief." Fed. R. Civ. P. 8(a). For purposes of a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6), the Court assumes the factual allegations in the complaint are true. *Lewis Lumber & Milling, Inc. v. Mereen-Johnson, LLC*, 2018 WL 6181356 at *1 (M.D. Tenn. Nov. 27, 2018). To survive a motion to dismiss, a complaint must contain sufficient factual allegations, accepted as true, to "state a claim to relief that is plausible on its face." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007) (internal marks omitted)). Satisfying this obligation requires more than "labels and conclusions" or "blanket assertion[s] of entitlement to relief." *Twombly*, 550 U.S. 544, 555.

The plausibility standard "asks for more than a sheer possibility that a defendant acted unlawfully." *Iqbal*, 556 U.S. at 678. A complaint's factual matter need not be overly detailed, but it "must . . . raise a right to relief above the speculative level." *Twombly*, 550 U.S. at 555. "Threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice." *Iqbal*, 556 U.S. at 679; *see also Twombly*, 550 U.S. at 555. Thus, "where the well-pleaded facts do not permit the court to infer more than the mere possibility of misconduct, the complaint has alleged--but it has not shown--that the pleader is entitled to relief" and must be dismissed. *Iqbal*, 556 U.S. at 679 (quotations omitted). Consistent with these

directives, the Sixth Circuit “has made clear that ‘a legal conclusion couched as a factual allegation’ need not be accepted as true on a motion to dismiss, and that a recitation of the elements of the cause of action is insufficient to state a claim for relief.” *HDC, LLC v. City of Ann Arbor*, 675 F.3d 608, 614 (6th Cir. 2012) (internal citations omitted).

“While pro se litigants are provided a more liberal review of their pleadings, such leniency should not force the Court to speculate as to the nature of Plaintiff’s claim or surmise the facts in support of conclusory accusations.” *Haliburton-Bryant v. Middle Tenn. State Univ.*, Case No. 3:08-0269, 2009 WL 2851299, at *3 (M.D. Tenn. 2009) (citations omitted) (dismissing *pro se* litigant’s complaint under *Twombly* standards). Even *pro se* litigants must satisfy the “rudimentary pleading standards set forth in *Twombly* and *Iqbal*.” *Cook v. Experian, Equifax & Transunion, LLC*, Case No. 10-14484, 2011 WL 4382020, at *3 (E.D. Mich. 2011). Thus, as this Court observed when recommending the dismissal of a *pro se* complaint on *Twombly* grounds:

Pro se litigants are not exempt from the requirements of the Federal Rules of Civil Procedure. The Court is not required to create a claim for a plaintiff. To demand otherwise would require the courts to explore exhaustively all potential claims of a *pro se* plaintiff, and would also transform the court from its legitimate advisory role to the improper role of an advocate seeking out the strongest arguments and most successful strategies for a party.

Parker v. Comprehensive Logistics Co., Case No. 1:18-cv-0065, 2018 U.S. Dist. LEXIS 208780, at *5-6 (M.D. Tenn. Nov. 19, 2018) (citations and internal quotation marks omitted).

Also, courts do not hesitate to dismiss copyright infringement suits on the pleadings when they suffer from fatal legal defects. *See Nat’l Bus. Dev. Servs., Inc. v. Am. Credit Educ. & Consulting Inc.*, 299 F. App’x 509, 512 (6th Cir. 2008) (“copyright infringement...lends itself readily to abusive litigation, since the high cost of trying such a case can force a defendant who might otherwise be successful in trial to settle in order to avoid the time and expenditure of a

resource intensive case. Therefore, greater particularity in pleading, through showing in ‘plausible grounds’ is required.”).

As discussed below, even taking Plaintiff’s *pro se* status into account, he does not come close to satisfying the plausibility standard, much less the pleading standard for copyright or trademark infringement claims. Accordingly, the Complaint must be dismissed.

ARGUMENT

I. All Copyright Infringement Claims Should be Dismissed with Prejudice

The Court should dismiss all Plaintiff’s copyright claims at least because the Complaint does not include sufficient factual allegations related to Plaintiff’s purported ownership of an unidentified copyrighted work and Reddit’s alleged copying of the protectable elements thereof to support direct copyright infringement, and includes no factual allegations that Reddit itself took any action to copy Plaintiff’s unidentified copyrighted work. Moreover, granting leave to amend would be futile, because even if the Complaint managed to adequately identify Plaintiff’s copyrighted work and Reddit’s role in any copying, the Complaint’s existing factual allegations already demonstrate that the accused post’s use of the drawing in the larger photograph is both fair and *de minimis*. In addition, Plaintiff’s many pleading deficiencies with respect to direct infringement doom any claims for secondary copyright liability.

A. Plaintiff’s Complaint Fails to Adequately Plead Direct Copyright Infringement

Plaintiff’s Complaint fails to state a claim for direct copyright infringement by Reddit. To prevail on a claim of copyright infringement, a plaintiff must show (1) ownership of a valid copyright, and (2) copying by the defendant of protected components of the copyrighted material. *See Feist. Publ’ns, Inc. v. Rural Tel. Serv. Co., Inc.*, 499 U.S. 340, 361 (1991); *Clever Factory, Inc. v. Kingsbridge Int’l, Inc.*, No. 3:11-1187, 2014 WL 2006777, at *4 (M.D. Tenn.

May 16, 2014); *see also Lexmark Int’l, Inc. v. Static Control Components, Inc.*, 387 F.3d 522, 534 (6th Cir. 2004) (“A plaintiff may establish a claim of copyright infringement by showing (1) ownership of a valid copyright in the [work] at issue . . . and (2) that the *defendant* copied *protectable elements* of the work.”) (emphasis added) (citations omitted). Thus, in its complaint, a plaintiff must show that the defendant has copied an element of the work that is original. *Feist*, 499 U.S. 340, 361 (1991). For example, in *Moses v. YouTube*, the Court adopted a magistrate’s recommendation that a *pro se* plaintiff’s copyright claims be dismissed “in full” for failure to state a claim. No. 12-2822-JPM-DKV, 2014 WL 549205, at *13 (W.D. Tenn. Feb. 11, 2014). Because the plaintiff had submitted a copyright registration, the Court assumed that she owned a copyright in a sound recording and a logo. *Id.* at *11. However, because the complaint did “not describe the protected and original elements of her work,” the “bare assertion” of illegal copying and display were insufficient. *Id.*

So too here. The Complaint does not identify the specific work that Reddit has allegedly copied, much less the protectable elements of that work. Plaintiff’s Complaint states “Reddit began to display the copyright and trademark on its business website without permission, on July 22, 2019. One of the defendant Reddit.com’s agents, or accomplices, photographed the Simcrimecom tm store location, depicting the brand copyright logo and painted signage that reads ‘Do not photograph this property. No consent.’ . . . The pirated copyright logo is seen in the webpage image as a rectangular white sign with black icon.” Compl. ¶ 5. The Complaint attaches a screenshot with a photograph of the alleged infringement as Exhibit B, as well as a federal copyright registration as Exhibit A. A clear screenshot of this same photograph is attached as Exhibit 1 to this Motion. The photograph includes multiple different drawings and text on the side of the building, and the copyright registration does not itself identify the

registered work except to say that it is an “image.” Ex. 1. Just as in *Moses*, these are fatal defects. The Complaint fails to support any direct copyright infringement claims because it does not plead facts that identify the protected work with any specificity, the original elements of the protected work that Reddit allegedly copied, or the alleged copying.³ Just as in *Moses*, Plaintiff’s copyright infringement claim should be dismissed with prejudice.

B. The Complaint Fails to Plead Any Volitional Conduct by Defendant

Also, in the Sixth Circuit, copyright infringement requires that a defendant intentionally and knowingly copy a copyrighted work. *Bridgeport Music, Inc. v. Dimension Films*, 410 F.3d 792, 802 (6th Cir. 2005) (emphasis added); *see also Perfect 10, Inc. v. Giganews, Inc.*, 847 F.3d 657, 666 (9th Cir. 2017) (“[D]irect infringement requires the plaintiff to show causation (also referred to as ‘volitional conduct’) by the defendant.”). This element is particularly important where, as here, a plaintiff seeks to hold a service provider directly liable for the conduct of a third-party. *See Average Joe’s Ent. Grp., LLC v. SoundCloud, LTD.*, No. 3:16-CV-3294-JPM-JB, 2018 WL 6582829, at *3 (M.D. Tenn. Oct. 17, 2018) (“A mere failure to act, such as a failure to police an Internet service or a failure to take affirmative steps to prevent infringement, does not suffice.”).

The Complaint does not contain a single well-pled factual allegation that Reddit engaged in any volitional conduct—*i.e.*, that it was “the one who directly violat[ed] the prohibitions of the Copyright Act.” *See CoStar Grp., Inc. v. LoopNet, Inc.*, 373 F.3d 544, 550 (4th Cir. 2004) (“[T]o establish direct liability... something more must be shown than mere ownership of a

³ A specific identification of the underlying work is especially important here because the drawing is rudimentary and the photograph includes multiple versions of the drawing. Any copyright protection the law affords such a rudimentary drawing would be thin—it would not cover every conceivable depiction of the object depicted.

machine used by others to make illegal copies. There must be actual infringing conduct[.]”). In fact, the screenshot attached as Exhibit B to the Complaint shows that the accused content was posted by an anonymous user, not by Reddit. Because the Complaint’s allegations do not provide more than a “blanket assertion of entitlement to relief,” they are insufficient, and the Complaint must be dismissed. *Twombly*, 550 U.S. at 555 n.3.

C. The Factual Allegations Demonstrate that Plaintiff Cannot State a Claim for Copyright Infringement

As explained above, the Complaint does not sufficiently identify the copyrighted work owned by Plaintiff to make out any claim of infringement. But even if it did—that is, even supposing the Complaint identified the exact black-and-white drawing on the sign in the photograph as Plaintiff’s underlying copyrighted work—it would only serve to confirm that the user-submitted post cannot support a claim for copyright infringement because the post’s use of the work is protected by fair use. It is also noninfringing as a de minimis use. *See* Ex. 1. These grounds for dismissal are in addition to the lack of volitional conduct by Reddit as discussed above. *See supra* Section B. For these reasons, granting Plaintiff leave to amend the complaint would be futile and the Complaint should be dismissed with prejudice in the interest of judicial economy. *See Moses*, 2014 WL 549205 at *11.

i. The Post’s Use of the “Artwork” Constitutes a Clear Fair Use

The Copyright Act itself provides that “the fair use of a copyrighted work ... for purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not an infringement of copyright.” 17 U.S.C. § 107. The statute lists four factors to guide courts in considering whether a use is a fair use: (1) the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes; (2) the nature of the copyrighted work; (3) the amount and substantiality of

the portion used in relation to the copyrighted work as a whole; and (4) the effect of the use upon the potential market for or value of the copyrighted work....”. *Id.*; *Princeton Univ. Press v. Michigan Document Servs., Inc.*, 99 F.3d 1381, 1385 (6th Cir. 1996). A court may determine as a matter of law on a motion to dismiss whether a challenged use qualifies as a fair use of a copyrighted work. *Harper & Row Publishers, Inc. v. Nation Enters.*, 471 U.S. 539, 560 (1985) (where a court has facts sufficient to evaluate the four fair use factors, it may conduct a fair use analysis without further fact finding); *see also Fisher v. Dees*, 794 F.2 432, 435-36 (9th Cir. 1986) (finding fair use where material facts were not at issue or had been admitted, and noting that judgments based on fair use are “legal in nature” and are to be made by the court).

Even if the drawing on the white sign shown in the photograph attached to the Complaint were itself the copyrighted work referenced in the Complaint, the post’s noncommercial social media use of the drawing in context—on a sign outdoors in a photographed scene of a commercial establishment, for purposes of commenting on the full scene—constitutes clear fair use. *See* 17 U.S.C. § 107; *see also Payne v. The Courier-Journal*, Case No. 3:04CV-488-R, 2005 WL 1287434, at *3 (W.D. Ky. May 31, 2005) (granting defendant’s motion to dismiss copyright infringement claims under Rule 12(b)(6) because a newspaper’s use of book excerpts constituted fair use as a matter of law).

ii. The Post’s Use of the “Artwork” is *De Minimis*

In addition to qualifying as fair use, the inclusion of a representation of the copyrighted work in the larger photograph does not constitute copyright infringement because that use is *de minimis*. *See Gordon v. Nextel Commc’ns & Mullen Advert., Inc.*, 345 F.3d 922, 924 (6th Cir. 2003); *see also Gottlieb Dev. LLC v. Paramount Pictures Corp.*, 590 F. Supp. 2d 625, 634 (S.D.N.Y. 2008) (granting motion to dismiss claims based on works that appeared incidentally in

a movie scene because “where the use is de minimis, the copying will not be actionable...”). Copying of protected material is *de minimis* when it is so trivial “as to fall below the quantitative threshold of substantial similarity, which is always a required element of actionable copying.” *See id.* Here, the copyrighted work is but a small portion of the accused photograph (less than 2% by area even including the white background) and an even smaller portion of the Reddit post webpage. *See* Ex. 1.

D. Plaintiff’s Complaint Fails to State a Claim for Secondary Copyright Infringement

Because secondary copyright infringement depends on the existence of an underlying infringement, each of the deficiencies identified above in the Complaint’s direct infringement allegations independently dooms any secondary liability theory as well. *See Gordon*, 345 F.3d at 926 (“[T]here can be no secondary liability absent primary infringement.”); *see also Moses*, 2014 WL 549205, at *11 (granting motion to dismiss for failure to state a claim for both contributory and vicarious liability because Plaintiff failed to allege direct infringement). To the extent the Complaint were construed as raising secondary copyright infringement claims, those claims should be dismissed because the Complaint is missing any allegations of fact supporting the additional elements of the secondary infringement causes of action.

i. Plaintiff’s Complaint Fails to State a Claim for Contributory Infringement

The allegations in the Complaint do not state a claim against Reddit for contributory copyright infringement. In *Metro-Goldwyn-Mayer Studios, Inc. v. Grokster, Ltd.*, the Supreme Court articulated the standard for imposing liability for contributory copyright infringement: “one infringes contributorily by intentionally inducing or encouraging direct infringement.” 545 U.S. 913, 930 (2005). Under *Grokster*, a defendant may be liable for contributory infringement

if (1) it provides a product or service incapable of substantial non-infringing uses or (2) intentionally induces infringement by clear expression or other affirmative steps to foster infringement. 545 U.S. at 936-37, 942. “[I]nducement requires evidence of culpable conduct, directed to encouraging another’s infringement, not merely that the inducer had knowledge of the direct infringer’s activities.” *Asentinel LLC v. Info Group, Inc.*, Case No. 10–2706–D/P, 2011 WL 3667517, at *5 (W.D. Tenn. Aug. 3, 2011) (citing *Grokster*, 545 U.S. at 936-37).

The Complaint has not pled any facts whatsoever to support a claim of contributory copyright infringement. The Complaint does not allege that Reddit intentionally induces infringement or otherwise has taken affirmative steps to foster copyright infringement. The Complaint therefore fails as a matter of law as to contributory copyright infringement.

ii. Plaintiff’s Complaint Fails to State a Claim for Vicarious Copyright Infringement

Vicarious liability exists when (1) a defendant has the right and ability to supervise the infringing conduct and (2) the defendant has an obvious and direct financial interest in the infringement. *Gordon*, 345 F.3d at 925. These elements are independent requirements, and each must be present to render a defendant vicariously liable. Here, the Complaint contains no facts to support that Reddit has the right and ability to supervise the alleged infringing conduct or that Reddit has an obvious and direct financial interest in the alleged infringement. Any claims of vicarious copyright infringement must be dismissed too. *See Nat’l Bus. Dev. Servs., Inc.*, 299 F. App’x 509 at 512 (dismissing copyright infringement claims for failure to allege facts sufficient to support infringement).

II. Plaintiff’s Complaint Fails to State a Claim for Trademark Infringement

Plaintiff has failed to allege any use of its trademark in commerce by Reddit. To state a claim for federal common law trademark infringement under the Lanham Act, Plaintiff must

establish (1) a protectable trademark; (2) that defendant used the mark in commerce; and (3) the use was likely to cause confusion. 15 U.S.C. § 1125. Similarly, to state a claim of trademark infringement under the Tennessee Trade Mark Act of 2000 of a state registered trademark, Plaintiff must plead that Reddit “uses [the mark] without consent of the registrant...in connection with the sale, distribution, offering for sale, or advertising any goods or services on or in connection with which such use is likely to cause confusion, mistake or deception as to the source of origin of such goods or services[.]” Tenn. Code Ann. § 47-25-512.

In either case, the Complaint must plead that Reddit used the mark in commerce and that such use was likely to cause confusion. It contains no such allegations, and instead clearly demonstrates that neither of these elements can be met. With respect to Reddit’s use of the mark, the Complaint alleges only that “[t]he webpage [referring to the user-submitted post] displays dialogue text that reads ‘simcrimecom’.” Compl. ¶ 5. The Complaint does not, nor can it, allege how this post by an anonymous user constitutes a “use in commerce” by Reddit. The fact that Reddit sells “ads and media advertising” (characterized incorrectly and without support as “management services”), *see* Compl. ¶ 8 & Ex. E thereto, does not convert every user-submitted post on Reddit that mentions a trademark by name into a use of that mark in commerce. *See Hensley Mfg. v. ProPride, Inc.*, 579 F.3d 603, 612 (6th Cir. 2009) (explaining that use in commerce in the likelihood of confusion analysis means a defendant is “using the challenged mark in a way that identifies the source of [defendant’s] goods” and if the use does not have this source-identifying function “then the mark is being used in a non-trademark way and trademark infringement laws...do not even apply.”).

It is even clearer that the use of Plaintiff’s mark on the Reddit webpage is not of a kind that is likely to cause confusion. In the trademark context, “confusion” refers to the origin,

sponsorship, or approval of the accused infringer's goods, services, or commercial activities. 15 U.S.C. § 1125(a); *see also Hensley Mfg.*, 579 F.3d at 612 (granting motion to dismiss for failure to "allege facts sufficient to show ... use ... creates a likelihood of confusion as to the source of its products"). The alleged use of the "simcrimecom" mark on the page appears in the context of a comment by a second user (perhaps the brother of the first user) that reads, in full,

So we drove by and I said drugs are bad ...

Simcrimecom on the back of the vehicle with... read the rest of the stuff.. I've literally been driving by for months now and I finally had my brother take some pics..

Haha

Ex. 1. Plainly, this user is commenting on the photograph. *See id.* The comment's mention of "simcrimecom" relates to that word's appearance on the rear window of the parked vehicle. It is utterly implausible that the commenter's mention of that mark would cause confusion with respect to the origin, sponsorship, or approval of Reddit's (or for that matter anyone else's) goods, services, or commercial activities. If anything, the comment refers to Plaintiff's business.

CONCLUSION

For the foregoing reasons, Reddit respectfully requests the Court to dismiss Plaintiff's Complaint *with prejudice*, and for other relief the Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on September 23, 2021, I electronically filed the foregoing
MEMORANDUM IN SUPPORT OF MOTION TO DISMISS with the Clerk of the Court
using the CM/ECF system, which will send notification of such filing to all attorneys of record.

On this date I further caused to be served on each of the persons identified below, via the
delivery methods indicated below, a copy of the foregoing document:

Maxwell Kremer (pro se)
470 #B
Swallowschapel Rd.
Cookeville, Tennessee 38506

<input type="checkbox"/>	Via the Clerk's eFiling Application
<input type="checkbox"/>	Via U.S. Mail, 1st Class
<input checked="" type="checkbox"/>	Via Overnight Delivery
<input type="checkbox"/>	Via Facsimile
<input type="checkbox"/>	Via Email
<input type="checkbox"/>	Other: _____

/s/ Jeremy D. Ray
Jeremy D. Ray